

Date

Mr. Boe Young
Impressions Marketing, Inc.
7951 Angleton Court
Lorton, Virginia 22079

Registration No.: 73714

Dear Mr. Young:

Attached is a state operating permit to operate a store and office display manufacturing facility in accordance with the provisions of the Commonwealth of Virginia State Air Pollution Control Board (Board's) Regulations for the Control and Abatement of Air Pollution (Regulations).

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all permit conditions carefully.

In the course of evaluating the application and arriving at a final decision to approve the project, the Department of Environmental Quality (DEQ) deemed the application complete on August 22, 2008 and solicited written public comments by placing a newspaper advertisement in the *Fairfax County (ADD NEWSPAPER NAME)* on DATE. The required comment period, provided by 9 VAC 5-80-1020 A, expired on DATE.

This approval to operate shall not relieve Impressions Marketing, Inc. of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within thirty days after this case decision notice was

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mailed or delivered to you. 9 VAC 5-170-200 provides that you may request direct consideration of the decision by the Board if the Director of the DEQ made the decision. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have thirty days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

In the event that this decision is served on you by mail, three days are added to the period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please call the regional office at (703) 583-3800.

Sincerely,

Terry H. Darton
Regional Air Permit Manager

TAF/THD/TMV/08XXXSOP

Attachment: Permit

CC: Director, OAPP (electronic file submission)
Manager, Data Analysis (electronic file submission)

STATIONARY SOURCE PERMIT TO OPERATE

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Impressions Marketing, Inc
7951 Angleton Court
Lorton, VA 22079
Registration No.: 73714

is authorized to operate

a store and office display manufacturing facility

located at

7951 Angleton Court
Lorton, VA 22079

in accordance with the Conditions of this permit.

Approved on

DATE

Thomas A. Faha
Regional Director

Permit consists of 10 pages.
Permit Conditions 1 to 22.

INTRODUCTION

This permit approval is based on the permit application dated June 10, 2008, and supplemental information dated August 18, 2008 and August 22, 2008. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-80-1110 (definitions) and 9 VAC 5-10-20 of the State Air Pollution Control Board's (Board) Regulations for the Control and Abatement of Air Pollution (Regulations). The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the Department of Environmental Quality (DEQ) or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

1. **Equipment List** - Equipment at this facility consists of the following:

Existing Equipment permitted prior to the date of this permit				
Reference No.	Equipment Description	Rated Capacity	Federal Requirements	Original Permit Date
SB-1	Spray Booth 1	100 sq ft/hr	None	NA
SB-2	Spray Booth 2	100 sq ft/hr	None	NA
SB-3	Spray Booth 3	100 sq ft/hr	None	NA
SB-4	Spray Booth 4	100 sq ft/hr	None	NA
PR-1	Vutek 150 60 inch digital ink jet printer	527 sq ft/hr	None	NA
PR-2	HP designjet 9000 printer	176 sq ft/hr	None	NA
PR-3	Nur Tempo UV	550 sq ft/hr	None	
	Various machine saws, radial arm saws, table saws and sanders	5,400,000 board ft per year	None	NA
BH-1	Dantherm Filtration Model CS3-M	15,000 cfm	None	NA

Specifications included in the permit under this Condition are for informational purposes only and do not form enforceable terms or conditions of the permit.
(9 VAC 80-850)

PROCESS REQUIREMENTS

2. **Emission Controls** - Particulate matter emissions from the wood working portion of the facility shall be controlled by the Dantherm Filtration baghouse (Ref. No. BH-1). The bag house shall be provided with adequate access for inspection and shall be in operation when the applicable wood working equipment is operating. The following equipment shall be controlled by a baghouse with at least a 95.5% efficiency rating:
 - Komo Machine Centers (Ref. Nos. 612285-07, 61154-07, 1993097, and 61284-10-07)
 - Schelling Saw (Ref. Nos. Saw 1 and Saw 2)
 - Rover 346 Machine Center (Ref. No. 41156)
 - Table saw (Ref. Nos. TS-1 and TS-2)
 - Mini Max (Ref. No. SA002129)
 - Sander (Ref. No. 062290)
 - Radial Arm Saw (Ref. No. DW-2)(9 VAC 5-80-850)
3. **Emission Controls** – Particulate matter emissions from each spray booth (Ref. Nos. SB-1- 4) shall be controlled by fabric filter (or equivalent). The fabric filters shall be provided with adequate access for inspection, and shall be in place whenever the spray booth is in operation.
(9 VAC 5-80-850)
4. **Emission Controls** – Volatile Organic Compound (VOC) emissions from the cleaning or purging operations shall be minimized by the adjustment of production schedules to minimize production changes.
(9 VAC 5-50-260)
5. **Fugitive VOC Emission Controls** - Fugitive emission controls shall include the following, or equivalent, as a minimum:
 - a. Volatile organic compounds shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.
 - b. Open equipment for conveying or transporting materials likely to create objectionable air pollution when airborne shall be covered, or treated in an equally effective manner at all times when in motion.(9 VAC 5-80-850 and 9 VAC 5-50-90)

6. **Fugitive Particulate Matter Emission Controls** - Fugitive particulate emissions from the collection, transfer and handling of wood waste shall be controlled by partial enclosure.
(9 VAC 5-80-850)

OPERATING LIMITATIONS

7. **Processing** - The woodworking portion of the facility shall process no more than 6,750 tons/yr of wood, calculated monthly as the sum of each consecutive twelve month period. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual totals for the preceding eleven months.
(9 VAC 5-80-850 and 9 VAC 5-80-1180)

EMISSION LIMITS

8. **Emission Limits** – Total VOC emissions from the operation of the facility shall not exceed 30.88 tons per year, and shall be calculated by using the following equation:

VOC Emissions (tons/year) =

$$\left(\text{Gallons of each solvent} \times \frac{\text{Pounds VOC for each solvent}}{\text{Gallon}} \right) \times \frac{1 \text{ ton}}{2000 \text{ lbs}}$$

VOC emissions must be calculated monthly as the sum of each consecutive twelve month period. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months.
(9 VAC 5-50-260 and 9 VAC 5-80-850)

9. **Emission Limits** - Emissions from the wood finishing portion of the facility shall not exceed the limits specified below:

	lbs/hr
PM-10	0.22

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits.
(9 VAC 5-80-850)

10. **Emission Limits: Hazardous Air Pollutants (HAPs)** - The permittee shall operate this facility in compliance with 9 VAC Chapter 60, Rules 6-4 and 6-5 for all HAPs.

For hazardous air pollutants, as defined by §112(b) of the Clean Air Act, the source may not emit ten tons per year or more of any single hazardous air pollutant nor may the source emit twenty-five tons per year or more of any combination of hazardous air pollutants, calculated monthly as the sum of each consecutive twelve month period. At least 90% of the plant-wide emissions per rolling twelve-month period must be associated with the making of retail signs and displays. A change in process formulation or the use of any additional HAP may require a permit to modify and operate.

(9 VAC 5-170-160, 9 VAC 5-60-200 and 9 VAC 5-50-200)

11. **Visible Emission Limit** - Visible emissions from each spray paint booth's stack shall not exceed five percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed ten percent opacity as determined by EPA Method 9 (reference 40 CFR Part 60, Appendix A).
(9 VAC 5-80-850)

RECORDS AND REPORTING

12. **On Site Records**— The permittee shall maintain records of emissions data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Regional Air Compliance Manager of the DEQ, Northern Regional Office (NRO) at the following address:

Regional Air Compliance Manager
Department of Environmental Quality
13901 Crown Court
Woodbridge, VA 22193

These records shall include, but are not limited to:

- a. Annual throughput of wood (as referenced in Condition 7). Annual throughput shall be calculated monthly as the sum of each consecutive twelve month period. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months.
- b. Annual consumption of each filler, stain, vinyl primer with catalyst, lacquer, coater, reducer, glue and lacquer thinner (as referenced in Condition 8), calculated monthly as the sum of each consecutive twelve-month period. Compliance for the consecutive twelve-month period shall be demonstrated

monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months.

- c. Records to demonstrate compliance with the hazardous air pollutant air emission limits in Condition 10.
- d. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content, toxic compound/HAP content, or VHAP content for each filler, stain, vinyl primer with catalyst, lacquer, coater, reducer, glue and lacquer thinner used.
- e. Monthly calculations for the emissions of HAP based on the throughput required in Condition 12.c, and the hap concentration listed in Condition 12.d. Demonstration of a consecutive twelve-month period shall be recognized by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months.
- f. Scheduled and unscheduled maintenance and operator training.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-850, and 9 VAC 5-50-50)

- 13. **Test/Monitoring Ports** - The permitted facility shall be provided when requested at the appropriate locations.
(9 VAC 5-50-30 F)

NOTIFICATIONS

- 14. **Notification for Control Equipment Maintenance** - The permittee shall furnish notification to the Regional Air Compliance Manager of the DEQ's NRO of the intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour, at least twenty-four hours prior to the shutdown. The notification shall include, but is not limited to, the following information:
 - a. Identification of the air pollution control equipment to be taken out of service, as well as its location, and registration number;
 - b. The expected length of time that the air pollution control equipment will be out of service;

- c. The nature and quantity of emissions of air pollutants likely to occur during the shutdown period;
- d. Measures that will be taken to minimize the length of the shutdown or to negate the effect of the outage.

(9 VAC 5-20-180)

GENERAL CONDITIONS

15. CERTIFICATION OF DOCUMENTS

- A. The following documents submitted to the board shall be signed by a responsible official: (i) any emission statement, application, form, report or compliance certification ; (ii) any document required to be signed by any provision of the board; or (iii) any other document containing emissions data or compliance information the owner wishes the board consider in the administration of its air quality programs. A responsible official is defined as:
 - 1. For a business entity, such as a corporation, association, or cooperative, a responsible official is either:
 - b. The president, secretary, treasurer, or a vice president of the business entity in charge of the principal business function, or any other person who performs similar policy or decision making functions for the business entity; or
 - c. A duly authorized representative of such business entity if the representative is responsible for the overall operation of one or more manufacturing, production or operating facilities applying for or subject to a permit and either (i) the facilities employ more than 250 persons, or have gross annual sales or expenditures exceeding \$ 25 million (in second quarter 1980 dollars) or (ii) the authority to sign documents has been assigned or delegated to such representative in accordance with procedures of the business entity.
 - 2. For a partnership or sole proprietorship, a responsible official is a general partner or the proprietor, respectively.
 - 3. For a municipality, state, federal or other public agency, a responsible official is either a principal executive officer or a ranking elected official. A principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of the principal geographic unit of the agency.

- B. Any person signing a document under subsection A above shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

- C. Subsection B shall be interpreted to mean that the signer must have some form of direction or supervision over the persons gathering the data and preparing document (the preparers), although the signer need not personally nor directly supervise these activities. The signer need not be in the same line of authority as the preparers, nor do the persons gathering the form need to be employees (e.g., outside contractors can be used). It is sufficient that the signer has authority to assume that the necessary actions are taken to prepare a complete and accurate document.
(9 VAC 5-20-230)

16. **Permit Suspension/Revocation** – This permit may be suspended or revoked if the permittee:
- a. Knowingly makes material misstatements in the permit application or any amendments to it;
 - b. Fails to comply with the conditions of this permit;
 - c. Fails to comply with any emission standard applicable to a permitted emissions unit, included in this permit;
 - d. Causes emissions from the stationary source which result in violations of, or interfere with the attainment and maintenance of, any ambient air quality standard; or
 - e. Fails to operate in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time an application for this permit is submitted.
- (9 VAC 5-80-1210 F)
17. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
- b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
- c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
- d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.

(9 VAC 5-170-130 and 9 VAC 5-80-850)

18. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Regional Air Compliance Manager of the DEQ's, NRO of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone, or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Regional Air Compliance Manager of the DEQ's NRO in writing at the address listed in Condition 12.

(9 VAC 5-20-180 C and 9 VAC 5-80-850)

19. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.

(9 VAC 5-20-180 I and 9 VAC 5-80-850)

20. **Maintenance/Operating Procedures** – At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-50-20 E and 9 VAC 5-80-850)

21. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Regional Air Compliance Manager of the DEQ's NRO, at the address listed in Condition 12, of the change of ownership within thirty days of the transfer.
(9 VAC 5-80-940)
22. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-860 D)